

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION, a Hawaii, nonprofit corporation; **NA'IMI PONO**, a Hawaii unincorporated association; and **KIPUKA**, a Hawaii unincorporated association,

Plaintiffs,

V.

DONALD H. RUMSFELD, Secretary of
United States Department of
Defense; and FRANCIS J. HARVEY,
Secretary of the United States
Department of the Army,

Defendants.

CIVIL NO. 04-00502 DAE BMK

DECLARATION OF COLONEL

ROBERT R. BROWN

Hearing:

Date: December 18, 2006

Time: 9:45 a.m.

Judge: Jon. David A. Ezra

DECLARATION OF COLONEL ROBERT R. BROWN

I, Colonel (P) Robert R. Brown, hereby declare that:

1. I am currently the Director, J-7 (Exercises & Training), United States Pacific Command. In my last assignment I served as the Commander, 1st Brigade, 25th Infantry Division, Stryker Brigade Combat Team. My last year in command was spent in combat with the Stryker Brigade in Operation Iraqi Freedom. A more complete statement of my background and experience is contained in the declaration I executed on November 7, 2006 and which was filed with this Court.

2. The Stryker provides superb protection for soldiers while maintaining the ability to transport as many as 11 soldiers in the Infantry variant.

3. **SPEED:** The Stryker routinely travels at speeds of 60 miles an hour in Iraq and that speed is a form of protection against enemy threats. The speed also enables the unit to react rapidly to any changing situation. On a daily basis, my soldiers relied on the speed of the Stryker vehicles to fight against the enemy and speed was a huge asset that helped us defeat many terrorists. My Stryker unit was given a challenging mission several hundred miles away from our area of operations in the Euphrates River Valley because the Strykers were the only unit and vehicle that could travel fast enough to accomplish the mission and they had the mobility needed to complete the mission.

4. **QUIET:** The Stryker is also very quiet and that also prevents the vehicle from giving away its position while moving to an operation. It was my experience in Iraq that the relative quiet of the Stryker protected our soldiers' lives by preventing ambushes because the enemy did not know we were coming. Other armored vehicles, such as the Bradley Fighting vehicle, are very noisy and give away the element of surprise.

5. **MOBILITY:** The Stryker has superb mobility due to its design and the fact that it does not have tracks like a Bradley Fighting Vehicle or an Abrams tank. The wheels enabled us to move rapidly in urban or desert terrain. The mobility enabled our soldiers to fight more effectively and rapidly close with the enemy when required.

6. **ENHANCED INFORMATION:** The digital equipment on the Stryker enabled soldiers to stay more informed of the situation around them and protected soldiers using this capability. For example, the ability to rapidly portray an enemy IED location on the digital screen inside the Stryker enabled the Stryker to avoid the location and maintain situational awareness. These digital systems also enhance command and control and enable soldiers to fight more effectively against the enemy by ensuring they

know where they are located on the battlefield, where their buddy is located and where the enemy is located. I routinely had superb situational awareness due to the digital systems that provided me the right information in a timely manner to make key decisions in the fight.

7. **PROTECTION:** The Stryker enables the gunner to remain protected while using the 50 caliber or Mark 19 weapons system due to the Remote Weapons Station (RWS) that is on the Stryker. This feature was used frequently while we were in Iraq and prevented a lot of casualties. The design of the Stryker with its armor protection and weapons systems protected countless soldiers during our year in Iraq. I witnessed huge explosions that soldiers walked away from because of the protection of the Stryker vehicle. I witnessed and experienced enemy firing a variety of weapons at the Stryker vehicle and the vehicle provided the protection required for the soldiers.

8. **ACCURACY:** The weapons systems on the Stryker are designed to provide accurate fires from within the protection of the vehicle using the RWS. This feature enabled my soldiers to stay protected and to protect innocent civilians by providing accurate fires that avoided needless collateral damage.

9. **LOGISTICS:** The reduction of a large and wasteful logistical support element is another huge advantage of the Stryker vehicle. Because there are multiple variants of the Stryker, the common chassis for all variants reduces the amount of repair parts and tools required for their repair. This allows more soldiers to be in the fight and less time to be spent on logistics and more on defeating the terrorists. When I commanded a Bradley Fighting Vehicle unit, we had a much larger and cumbersome logistical section due to the number of variants of vehicles within the unit. This reduced

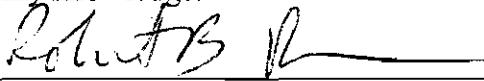
our effectiveness as a Bradley fighting unit, a problem that has been solved by the Stryker system.

10. **CONCLUSION:** On a daily basis, I traveled throughout my sector in Iraq in my Stryker and the vehicle had approximately 50,000 miles of use. Every soldier I ever asked, and this was hundreds, throughout the year the brigade was in Iraq, was very glad to ride in a Stryker and it was their vehicle of choice. Without the many benefits of the Stryker, the ability to be successful in Operation Iraqi Freedom and the protection of America will be severely harmed. Our soldiers deserve and need the best equipment that will enable them to do their mission and provide them the protection they deserve.

11. I have attached an informational video that we made while I was deployed to Iraq. Attachment 1. All of the soldiers in the video served under my command.

The many benefits the Stryker incorporates for the protection of our soldiers is critical to keep them safe. I am certain that if my unit had not been equipped with Strykers, we would have had hundreds of soldiers killed and many more seriously wounded. Our soldiers deserve the best vehicle we can provide them and that is the Stryker vehicle.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

A handwritten signature in black ink, appearing to read "Robert B. Brown", is written over a horizontal line.

COLONEL (P) ROBERT B. BROWN

A handwritten date "15 Dec 06" is written in black ink over a horizontal line.

Date